

Back in the days of 3G phone and Internet service when 3G connections were being rolled out there were a number of interoperability problems. AT&T Mobility went with GSM technology for its 3G network which many international cellular phone networks also used. Verizon Wireless in contrast went with CDMA (less used than GSM outside the U.S.) effectively making handsets that work with Verizon Wireless's network incompatible with AT&T's network and vice versa. When Apple brought the iPhone 4 to Verizon Wireless they introduced a new model using CDMA technology. They could not even if they wanted to provide existing iPhone 4 users on AT&T's GSM network the ability to unlock their phones from AT&T and move to Verizon. The switch to 4G was meant to change all that with AT&T and Verizon Wireless both adopting 4G LTE making their networks on first glance appear more compatible. Even then there are interoperability issues. One cannot use an iPad 3 made for Verizon's 4G LTE network with AT&T's 4G LTE network nor can an AT&T based iPad 3 work with Verizon Wireless. Not only are their networks incompatible with each other but with smaller carriers.

Verizon's proposed spectrum sale of 700 MHz Lower A & B block spectrum threatens to kill any future hope of LTE interoperability. Worse Verizon Wireless has sufficient AWS spectrum already that it is under-utilizing. We need device carrier interoperability to foster more wireless competition. Please enact 700 MHz Interoperability rules (12-69), Strong AWS Service Rules with build-out requirements for Verizon Wireless to use its existing AWS spectrum favoring interoperability (12-70) and deny Verizon SpectrumCo and Cox's applications (12-4).